

Environmental Health Management



**Report
for
OSHA Compliance Monitoring
at
Branham Corporation**

Prepared for:

**Branham Corporation
633 Meriwether Ave.
Louisville, KY 40217**

Prepared By:

**Environmental Health Management
Louisville, Kentucky**

Report Date:

January 4, 2013

Douglas W. Peters and Associates, Inc.

Environmental Health Management



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3701 Taylorsville Road, Suite 1
Louisville, Kentucky 40220
(502) 454-8530 Fax (502) 454-8528

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Project Summary

Douglas W. Peters and Associates, Inc. d.b.a. Environmental Health Management (EHM) performed asbestos air monitoring services for the Branham Corporation during the cutting of reportedly asbestos containing material to produce gaskets. The air monitoring took place on December 18, 2012. Personnel air monitoring was conducted in accordance with OSHA Asbestos Regulation 1910.1001.

The asbestos operations involved the stamping and cutting of reportedly asbestos containing material with rubber binders into gaskets.

One worker places sheets of rubberized material onto a table where gaskets ranging diameters from 4' to 4" are cut using a stamping process. At another table, the material is also cut into gaskets using a handheld, sign/pattern makers electric jig saw. No personal protective equipment (PPE), (disposable coveralls, HEPA-filtered respirators) or HEPA air filtration are utilized in the process.

The gasket stamping table was in the same area, about twenty feet from other stamping machines, used for other non-ACM gasket production simultaneously by other personnel.

Personal air monitoring took place on while stamping and cutting the material into gaskets. Short term exposure (STEL) and eight hour time weighted averages (TWA) for personnel exposure to fiber concentrations were calculated based on sample analysis of all samples collected for the employee throughout the shift.

Samples collected were analyzed on site at Branham or at the Environmental Health Management office in Louisville, Kentucky. The samples were collected on 25 mm, 0.8 μ m mixed cellulose ester filter cassettes using low volume battery powered pumps. Sampling pumps were calibrated before and after sampling. The samples were analyzed by NIOSH Method 7400 using phase contrast microscopy. Fibers greater than 5.0 micrometers in length with a length to width ratio of 3:1 were counted. Quality Control sample analysis took place and involved the analysis of one duplicate air sample. The comparison between the two analyses indicated acceptable proficiency. Blank sample media from the allotment of cassettes used on the project were analyzed and indicated that the sampling media was acceptable. Douglas W. Peters and Associates, Inc., d.b.a. Environmental Health Management is rated proficient in the NIOSH/AIHA Proficiency Analytical Testing Program for Asbestos (Lab # 103223).

Personnel samples were collected from 8:00 AM to 14:35 PM, during gasket stamping and cutting. Short term excursion air samples were collected throughout this time and consisted of approximately 30 minutes of air testing each. The excursion samples were collected during work periods when the maximum fiber concentrations were expected to occur.

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Listed in the table below are the air sample results for the personnel monitored during the 8-hour work shift, and the stationary air sample locations, on December 18, 2012:

Sample Number	Sample Location	Sample Results (f/cc)*	Start Time	Stop Time
1125870-PCM-001	(2809), cutting gaskets	0.059	08:15	08:45
1125870-PCM-002	(2809), cutting gaskets	0.031	08:45	09:12
1125870-PCM-003	(2809), cutting gaskets	0.020	09:12	09:48
1125870-PCM-004	(2809), cutting gaskets	0.026	09:48	10:20
1125870-PCM-005	(2809), cutting gaskets	0.028	10:46	11:15
1125870-PCM-006	(2809), cutting gaskets	0.010	11:15	11:50
1125870-PCM-007	(2809), cutting gaskets	0.018	11:50	12:30
1125870-PCM-008	(2809), cutting gaskets	0.008	13:06	13:35
1125870-PCM-009	(2809), cutting gaskets	0.008	13:35	14:05
1125870-PCM-010	(2809), cutting gaskets	0.033	14:10	14:35

* f/cc = fibers per cubic centimeter of air

A total of 10 excursion air samples were collected on _____ during the work shift. The air sample results were calculated to determine the Time-Weighted Average (OSHA TWA) based on an 8 - hour work shift.

Listed in the table below is the calculated TWA results for the work shift monitored on December 18, 2012:

Sample Location	8-Hour Time Weighted Average (f/cc)*
(2809), cutting gaskets	0.014

* f/cc = fibers per cubic centimeter of air

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The OSHA PEL (Permissible Exposure Limit) is 0.1 f/cc, for an 8-hour work shift. The 30 minute excursion level for asbestos related work is 1.0 f/cc.

The TWA for the stamping and cutting operations (0.014 f/cc) was found to be below the PEL.

Based on the TWA results for the employee monitored, no respiratory protection is necessary during the stamping or cutting operations in regards to OSHA Regulations for the General Industry, involving asbestos.

It was observed that the unused scrap pieces of reportedly ACM material were placed in a dumpster with other waste and disposed with normal plant waste. EHM recommends that asbestos-containing waste be double bagged in 6 mil. polyethylene bags and placed in sealed, rigid containers (for example: steel drums, fiber drums, or heavy cardboard boxes) properly labeled for transport to an approved landfill that has approval from the Kentucky Division of Waste Management to accept asbestos- containing waste according to Title 401 KAR Chapter 47 and meets all other applicable local, state, and federal laws. Retain all waste manifests and receipts from landfill.

5701 Taylorsville Road, Suite F
Louisville, Kentucky 40220
(502) 454-8530 Fax (502) 454-8528

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Limitations

The information contained in this report has been obtained through conversations, sampling and survey. The evaluation, conclusions and recommendations of this report are based solely upon the conditions present at the facility during the sampling period. Although great care has been taken by Douglas W. Peters and Associates, Inc., d.b.a. Environmental Health Management in compiling and checking the information contained in this report to insure that it is current and accurate, Douglas W. Peters and Associates, Inc., d.b.a. Environmental Health Management disclaims any and all liability for any errors, omissions or inaccuracies in such information and data, whether attributable to inadvertence or otherwise, and for any consequence arising therefrom. The data provided hereunder neither purports to be nor constitutes legal or medical advice. Douglas W. Peters and Associates, Inc., d.b.a. Environmental Health Management shall not be liable for any special, consequential or exemplary damages resulting, in whole or in part, from customers use of the data. Liability on the part of the Douglas W. Peters and Associates, Inc., d.b.a. Environmental Health Management is limited to the monetary value paid for this report.



Ex. 6 - Personal Privacy

Survey reviewed by: _____

Date: January 4, 2013

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Air Sampling Data Sheets

3701 Taylorsville Road, Suite 1
Louisville, Kentucky 40220
(502) 454-8530 Fax (502) 454-8528

Air Sample Data Sheet

Project # 112-5870

Facility Location: Branham Corp
633 Meriwether Ave
Contractor: N/A

City: Louisville

State: KY

Client: Branham Corp

Sampled By: B. Hughes

Date Sampled: 12/18/2012

Sample Media: 25 mm, 0.8 um MCE

Lot #: Env. Express
20120420

Parameter(s): Asbestos Air

Lab #	Field Sample #	Pump #	Sample Location and Activity	Pre-cal. Flw Rt	Post-cal. Flw Rt	Sample Type	Start Date/Time	Stop Date/Time	Sample Time	Ave. Flow Rate	Volume	Density (f/mm2)	Results
	PCM-001	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	08:15	08:45	30	2.04	61	9.36	0.059
	PCM-002	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	08:45	09:12	27	2.04	55	4.37	0.031
	PCM-003	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	09:12	09:48	36	2.04	73	3.75	0.020
	PCM-004	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	09:48	10:20	32	2.04	65	4.37	0.026
	PCM-005	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	10:46	11:15	29	2.04	59	4.37	0.028
	PCM-006	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	11:15	11:50	35	2.04	71	1.87	0.010
	PCM-007	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	11:50	12:30	40	2.04	82	3.75	0.016
	PCM-008	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	13:06	13:35	29	2.04	59	1.25	0.008
	PCM-009	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	13:35	14:05	30	2.04	61	1.25	0.008
	PCM-010	EPP-42	(2809) cutting ACM gasket material	2.04	2.04	E	14:10	14:35	25	2.04	51	4.37	0.033

For Asbestos-PCM Analysis:

RFA: 0.00801

Blank Fiber Density: 0.000

Duplicate Sample #: 112-5870-PCM-003

Duplicate Fiber Density: 3.12

QC Result: Accepted

Analyst: B. Hughes

Date: 12/18/2012

Calibration Method:

Rotameter

ERT005L

Sample Type Code: B=Background, P=Personnel, IA=Inside Work Area,
OA=Outside Work Area, C= Clearance, E=Excursion, O=Other

Any handwritten results are preliminary and may change pending final review.



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Certificate of Completion

This is to certify that

Robert K. Hughes

has met the general requirements and satisfactorily completed

NIOSH 582 Equivalency Course
Sampling and Evaluating Airborne Asbestos Dust

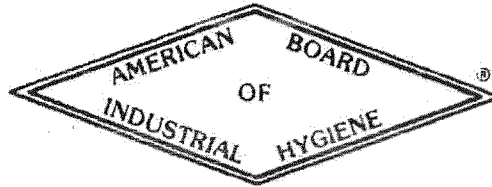
as presented by Environmental Health Management
August 15 through September 2, 2005



Ex. 6 - Personal Privacy

Douglas W. Peters
Douglas W. Peters, CIH, CSP
Director, Training Services

The
American Board of Industrial Hygiene®
ABIH®



organized to improve the practice of Industrial Hygiene
proclaims that

Douglas W. Peters

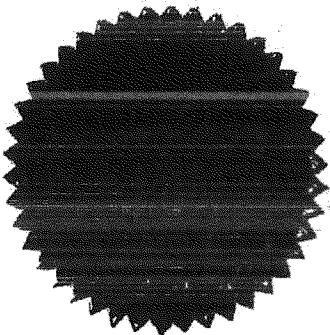
having met all requirements through
education, experience, and examination,
is hereby certified in the

COMPREHENSIVE PRACTICE
of
INDUSTRIAL HYGIENE

and has the right to use the designations

CERTIFIED INDUSTRIAL HYGIENIST

CIH



December 9, 1991
date

Kenneth M. Wallingford
Chairman ABIH

5399
certificate
number

Monty Hene
Secretary ABIH

Douglas W. Peters and Associates, Inc.

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Daily Activity Time Log

3701 Taylorsville Road, Suite 21
Louisville, Kentucky 40220
(502) 454-8530 Fax (502) 454-8528

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Activity Time Log

Facility: Branham Corp

Date: 12/18/2012 Project #: 112-5870

Technician: Bob Hughes

<u>Time</u>	<u>Activity</u>
08:00	EHM Representative, Bob Hughes arrives on site. Branham representative, escorts B. Hughes to second floor gasket shop where he will be cutting ACM gasket material with die cutting press as well as sign making saw. B. Hughes starts one personal sample. starts with 6' x 20' sheet of gasket material and presses gaskets from 3' to 4" in diameter using hydraulic press and cutting die. No PPE or air ventilation being used in area. Die press approximately 20' from another worker cutting gaskets with other materials.
08:45	B. Hughes changes cassettes as cutting gaskets with hydraulic press.
09:12	B. Hughes changes cassettes as cutting gaskets with hydraulic press.
09:50	B. Hughes changes cassettes. begins cutting gaskets with sign making saw.
10:20	takes break. B. Hughes collects cassette.
10:45	resumes cutting gaskets with sign making saw. B. Hughes starts personal cassette.
11:50	B. Hughes changes cassettes. Scrap pieces go into dumpster with normal waste. No double bagging, etc.. DuPont and WestLake only two customers that require ACM gaskets.
12:30	Break for lunch. B. Hughes collects cassettes.
13:00	Return from lunch and resume cutting gaskets with hydraulic stamping machine.
14:05	B. Hughes changes cassettes.
14:35	finishes cutting gaskets for day. B. Hughes collects cassette and returns to EHM offices to analyze.

I attest that the information presented above is true and accurate to the best of my knowledge and represents the activities of the day on this project.

SIGNED: _____